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**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**DIANE ROARK,**

Case No.: 6:12-CV-01354-MC

Plaintiff,

**AMENDED PLAINTIFF'S RESPONSE TO  
DEFENDANT'S PROPOSED PLAN FOR  
RETURN OF ELECTRONICALLY STORED  
INFORMATION**

v.

**UNITED STATES OF AMERICA,**

Defendant.

Plaintiff submitted her original response to the government's proposed plan for return of ESI on July 6. She then realized that the printout for Attachment 1 required collation because the metadata describing emails returned to Edward Loomis spanned 14 categories spread horizontally over 5 pages. This is an amended replacement for Attachment 1. The attachment is now shorter, 6 pages long, and presents the metadata for the first 16 of Mr. Loomis' 148 emails that were retained by the government.

The government kept far more of Thomas Drake's documents. A sample from one of three metadata files provided to him was enclosed as Attachment 2 in the original filing. Some of these also exceeded one page, but Plaintiff's printer ceased working before she was able to print and collate them for this amended submission. In contrast with the 14 metadata categories provided to Loomis, in this file Drake was given only 3 metadata categories, as can be observed by paging through Plaintiff's

original Attachment 2. They include:

Name	(NSA's document number and the email "Subject" line)
Resolution	(reason for refusing to return)
# of Pages	(length of the email)

Respectfully submitted and dated this 9<sup>th</sup> day of July, 2015.



Diane Roark, Pro se

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Amended Plaintiff's Response to Defendant's Proposed Plan for Return of Electronically Stored Information** was placed in a postage prepaid envelope and deposited in the United States Mail at Stayton, Oregon on July 9, 2015, addressed to:

James E. Cox, Jr., AUSA  
1000 SW Third Av., Suite 600  
Portland, OR 97204